

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.

CR 13-61 DSD/AJB

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

v.

BRIAN LUKE BROULIK

18 U.S.C. § 2251(a)  
18 U.S.C. § 2251(e)  
18 U.S.C. § 2252(a)(2)  
18 U.S.C. § 2252(a)(4)(B)  
18 U.S.C. § 2252(b)(2)  
18 U.S.C. § 2253

Defendant.

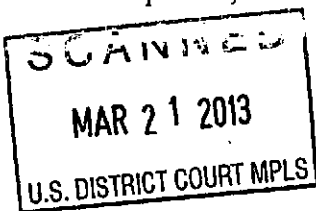
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1  
(Production of Child Pornography)

On or about May 12, 2012, in the State and District of Minnesota, the defendant,

**BRIAN LUKE BROULIK,**

having been twice previously convicted under the laws of the State of Minnesota relating to the sexual exploitation of children, namely a conviction on or about July 7, 1997 for Second Degree Criminal Sexual Conduct in violation of Minnesota Statute 609.343, Subdivision 1(a), and a conviction on or about February 24, 1998 for Second Degree Criminal Sexual Conduct in violation of Minnesota Statute 609.343, Subdivision 1(a), did employ, use, persuade, induce, entice, and coerce A.A.A., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials, including a Motorola Droid Razr cellular telephone, and a 16 GB Micro SD card that had been mailed, shipped, and transported in



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RICHARD D. SLETTEN, CLERK  
JUDGMENT ENTERED \_\_\_\_\_  
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interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2  
(Distribution of Child Pornography)

On or about March 9, 2012, in the State and District of Minnesota, the defendant,

**BRIAN LUKE BROULIK,**

having been twice previously convicted under the laws of the State of Minnesota relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, namely a conviction on or about July 7, 1997 for Second Degree Criminal Sexual Conduct in violation of Minnesota Statute 609.343, Subdivision 1(a), and a conviction on or about February 24, 1998 for Second Degree Criminal Sexual Conduct in violation of Minnesota Statute 609.343, Subdivision 1(a), did knowingly distribute visual depictions using a means and facility of interstate commerce that had been mailed, shipped and transported in and affecting interstate commerce, by any means including a computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such depictions are of such conduct, including, but not limited to, the following computer image files:

- (1) !!!!!0010 tommetje16.jpg;
- (2) (Nice-Little-boy) 175.jpg;
- (3) 100\_2029.jpg;
- (4) 20090611042102-zbuhetaatoavxsddj.jpg; and
- (5) boys in action – 127.jpg

all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT 3  
(Possession of Child Pornography)

On or about May 24, 2012, in the State and District of Minnesota, the defendant,

**BRIAN LUKE BROULIK,**

having been twice previously convicted under the laws of the State of Minnesota relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, namely a conviction on or about July 7, 1997 for Second Degree Criminal Sexual Conduct in violation of Minnesota Statute 609.343, Subdivision 1(a), and a conviction on or about February 24, 1998 for Second Degree Criminal Sexual Conduct in violation of Minnesota Statute 609.343, Subdivision 1(a), did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped and transported in interstate and foreign commerce, and which were produced using materials which had been mailed, shipped or transported in interstate and foreign commerce, by any means, including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer image and video files:

- (1) Trevor 04Mar08\_1.jpg;
- (2) cute 8yo little boy Trevor and daddy sexy sex (04-March-2008)NEW!!!.mpg;
- (3) !! yBOY lie-ON-dad.mpeg;
- (4) ---(4).wmv;
- (5) dadzBoy03a.avi;

- (6) P101-5yo Boy + friend suck dad (2cums!!!).mpg;
- (7) !New-WOW!!-spongebob d explore.avi;
- (8) 3yo girl squirms as dad shoots cum into her mouth.avi;
- (9) 001..mpg; and
- (10) boys on a train.mpg

all in violation of Title 18, United States Code, Section 2252(a)(4)(B) and 2252(b)(2).

### **FORFEITURE ALLEGATIONS**

Counts 1 through 3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including:

- a. SanDisk Cruzer 4GB USB drive, serial number BH1005VKRN;
- b. Motorola Razr XT912, IMEI 990001185211489;
- c. Dell inspiron 1545 Laptop computer, serial number 335241429;
- d. Hitachi 320 GB hard drive, model number HTS543232L9A300, serial number 090701FB2406LEEZZN8H;
- e. 16 GB Micro SD card.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2251(a), 2251(e), 2252(a)(4)(B), 2252(b)(2) and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON